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WASHINGTON, DC 20037

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June 21, 2017

ARTHUR BLOOSTON
1914 – 1999

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

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OF COUNSEL

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com
202-828-5562

REDACTED – FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2017
WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,¹ Peñasco Valley Telephone Cooperative, Inc. (the Company) hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Further, pursuant to the *Protective Order* adopted by the Commission in this proceeding,² the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its Line 200 Outage Report pursuant to sections 0.457 and 0.459 of the Commission's Rules. A

¹ 47 CFR §§54.313 and 54.422.

² *In the Matter of Connect America Fund, et al.*, PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 16-296, released March 22, 2016.

letter in support of the Company's request is attached hereto.

In accordance with the *Protective Order* and the Commission's rules, one redacted copy has been filed via ECFS, and confidential, one non-redacted copy has been submitted on paper via hand delivery to the Secretary's Office.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', with a stylized, cursive script.

Salvatore Taillefer, Jr.

Counsel to
Peñasco Valley Telephone Cooperative, Inc.

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445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2017
WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Peñasco Valley Telephone Cooperative, Inc. ("the Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the outage reporting information (the "Confidential Information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. *Identification of the specific information for which confidential treatment is sought.*

The Company seeks confidential treatment of its outage information, Line 200, which contains competitively sensitive information.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The Confidential Information is being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The Confidential Information is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors," and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Confidential Information relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Confidential Information is likely to result in substantial competitive harm to the Company because the Confidential Information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

The Company does not make the Confidential Information publically available in any way and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

The Company does not make the Confidential Information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Confidential Information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the Confidential Information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the Confidential Information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', written in a cursive style.

Salvatore Taillefer, Jr.
Counsel for
Peñasco Valley Telephone Cooperative, Inc.

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

REDACTED - FOR PUBLIC INSPECTION

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Ian Brumana
<035> Contact Telephone Number: Number of the person identified in data line <030>	5757481271 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	ibrumana@pvt.com
Form Type	54.313 and 54.422

REDACTED - FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)

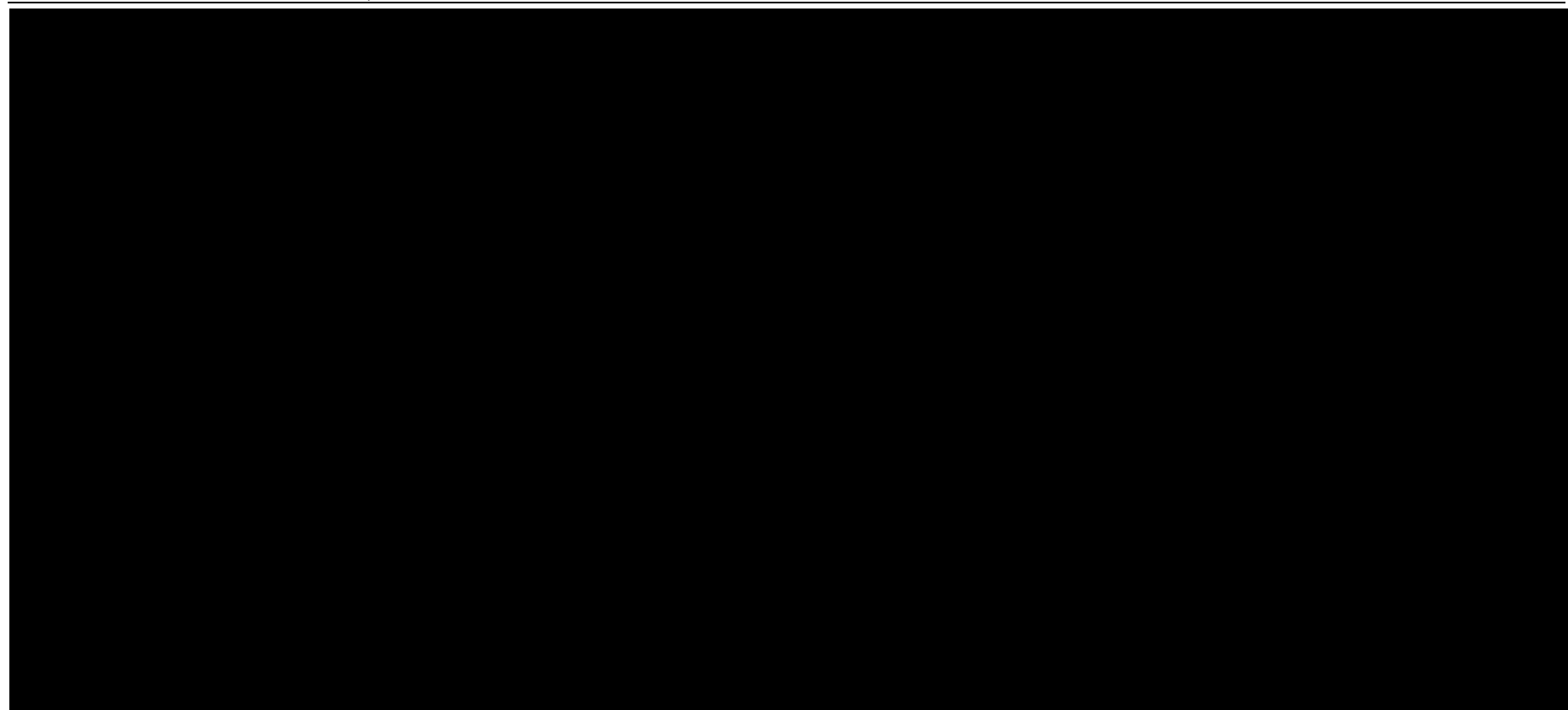
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com



(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
492270NM510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED - FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	492270NM610 .pdf

REDACTED - FOR PUBLIC INSPECTION

[illegible]

REDACTED - FOR PUBLIC INSPECTION

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

<921>

<922> Feasibility and sustainability planning;
<923> Marketing services in a culturally sensitive manner;
<924> Compliance with Rights of way processes
<925> Compliance with Land Use permitting requirements
<926> Compliance with Facilities Siting rules
<927> Compliance with Environmental Review processes
<928> Compliance with Cultural Preservation review processes
<929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 492270NM1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 492270NM1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130>

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP www.pvt.com/telephone/low-income-support/

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2005) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan		
(3009)	Carrier certifies to 54.313(f)(1)(iii)	
		Yes - Attach Certification
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Not Applicable - No Attachment Required
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No) <input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No) <input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) <input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or	<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

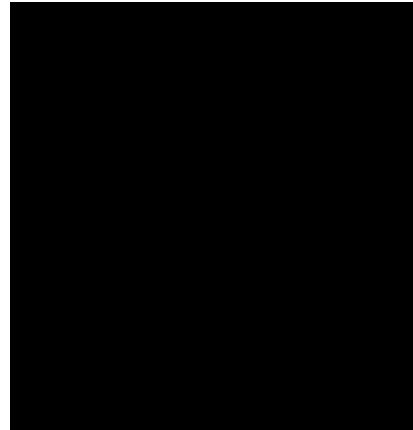
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2018
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<039> Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PENASCO VALLEY TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/21/2017
Printed name of Authorized Officer: Kevin Bartley	
Title or position of Authorized Officer: Chief Financial Officer	
Telephone number of Authorized Officer: 5757481241 ext.	
Study Area Code of Reporting Carrier: 492270	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

492270NM510

Peñasco Valley Telephone Cooperative, Inc.
Study Area: 492270

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Peñasco Valley Telephone Cooperative, Inc. ("ILEC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. ILEC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. ILEC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.pvt.com which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition ILEC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

ILEC also outlines its rates, terms, and conditions under which ILEC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. ILEC keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) ILEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband services issues on an annual basis. In addition ILEC has placed on its website at www.pvt.com its network practices and policies regarding broadband.

ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Ability To Function in Emergency Situations

Peñasco Valley Telephone Cooperative, Inc. (PVT) is able to function in emergency situations for both voice and broadband service.

PVT has battery backup at all central offices, remote offices and electronic digital loop carrier sites. All of these sites are also either equipped with a standby generator or a connection for a portable generator. The portable generators are stored at various locations within PVT's service area so they can be deployed quickly as needed. All batteries are tested yearly and all standby generators are tested weekly.

PVT has planned for network issues by establishing alternate toll routes, and where possible, establishing fiber rings between its main host central office and its remote offices. The majority of PVT's toll traffic and interconnection trunks utilize a collapsed ring fiber segment from the Cottonwood host central office north to CenturyLink in Roswell, NM. PVT also has a separate toll route going southeast to the Hobbs, NM AT&T point of presence, which allows PVT to manage traffic spikes in emergency situations. PVT's SS7 signaling links are split between these two toll routes along with its long distance trunks so that a single fiber cut, even on its main fiber route, cannot take the Cooperative completely down and isolate its network.

PVT currently has two bonded 1 Gb Internet circuits traversing one egress path plus an additional two 1 Gb CBR burstable circuits traversing a second diverse egress path for all of the broadband traffic. If one peer or path goes down, the traffic will automatically route over alternate path and peers. PVT has added two segregated authoritative DNS servers to protect its customers from a denial of service vulnerability with recursive DNS servers. PVT has added new switches to remove single points of failure and to provide increased throughput within its network in the future.

REDACTED - FOR PUBLIC INSPECTION

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees		Broadband Service - Download Speed (Mbps)			
	NM	Cottonwood	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Lakewood	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Hope	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Hondo	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Loco Hills	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Mayhill	69.96	0.0	69.96	4.0	1.5	999999.0	Other, None
	NM	Cottonwood	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Lakewood	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Hope	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Hondo	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Loco Hills	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Mayhill	72.95	0.0	72.95	6.0	1.5	999999.0	Other, None
	NM	Cottonwood	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None
	NM	Lakewood	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None
	NM	Hope	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None
	NM	Hondo	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None
	NM	Loco Hills	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None
	NM	Mayhill	74.95	0.0	74.95	10.0	1.5	999999.0	Other, None

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Ian Brumana
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481271 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ibrumana@pvt.com
<810>	Reporting Carrier	Penasco Valley Telephone Cooperative, Inc.
<811>	Holding Company	Penasco Valley Telephone Cooperative, Inc.
<812>	Operating Company	Penasco Valley Telephone Cooperative, Inc.

492270NM1010

Penasco Valley Telephone Cooperative, Inc.

Study Area 492270

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Pensaco Valley Telephone Cooperative, Inc. ("PVT") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$49.51 as specified in Public Notice DA 17-167 issued on February 14, 2017. PVT's current total local end-user rate¹ of \$18.91 (which includes a local fee of \$.91 and surcharges and any EAS) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

						Mandatory		
	Exchange		Residential Local	State Sub Line	State Univer.	Ext. Area	Total Per Line	National
State	(ILEC)	Rate type	Service Rate	Charge	Service Fee	Service Charge	Rates and Fees	Average
NM	Cottonwood	FR	18 00	0	0.91	0	18.91	22.49
NM	Lakewood	FR	18 00	0	0.91	0	18.91	22.49
NM	Hope	FR	18 00	0	0.91	0	18.91	22.49
NM	Hondo	FR	18 00	0	0.91	0	18.91	22.49
NM	Loco Hills	FR	18 00	0	0.91	0	18.91	22.49
NM	Mayhill	FR	18 00	0	0.91	0	18.91	22.49
The national average is above Pensaco Valley Telephone Cooperative's rate in every exchange								

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

492270NM1030

Pensaco Valley Telephone Cooperative, Inc.

492270

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (11) Penasco Valley Telephone Cooperative, Inc. ("PVT") charges a residential rate of \$74.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$78.17, which is the 2017 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service Download Speeds	Broadband Service Upload Speeds	Usage Allowance	Benchmark Rate
NM	Cottonwood	74.95	0	74.95	10.0	1 5	Unlimited	78.17
NM	Lakewood	74.95	0	74.95	10.0	1 5	Unlimited	78.17
NM	Hope	74.95	0	74.95	10.0	1 5	Unlimited	78.17
NM	Hondo	74.95	0	74.95	10.0	1 5	Unlimited	78.17
NM	Loco Hills	74.95	0	74.95	10.0	1 5	Unlimited	78.17
NM	Mayhill	74.95	0	74.95	10.0	1 5	Unlimited	78.17

Penasco Valley Telephone's rate is at or below the benchmark for 10/1 in all exchanges.

¹ Wireline Competition Bureau Announces Results of 2017 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 17-167 (rel. February 14, 2017).

492270NM3010B

Peñasco Valley Telephone Cooperative, Inc.

Study Area: 492270

Public Interest Obligation Certification

Pursuant to 47 C.F.R. §53.313(f)(1)(i), Peñasco Valley Telephone Cooperative, Inc. hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

REDACTED FOR PUBLIC INSPECTION

USDA-RUS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		BORROWER NAME	
		Penasco Valley Telephone Cooperative, Inc. (Prepared with Audited Data)	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2016	BORROWER DESIGNATION NM0512
CERTIFICATION We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES. DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following) <div></div>			

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

NM0512

PERIOD ENDING

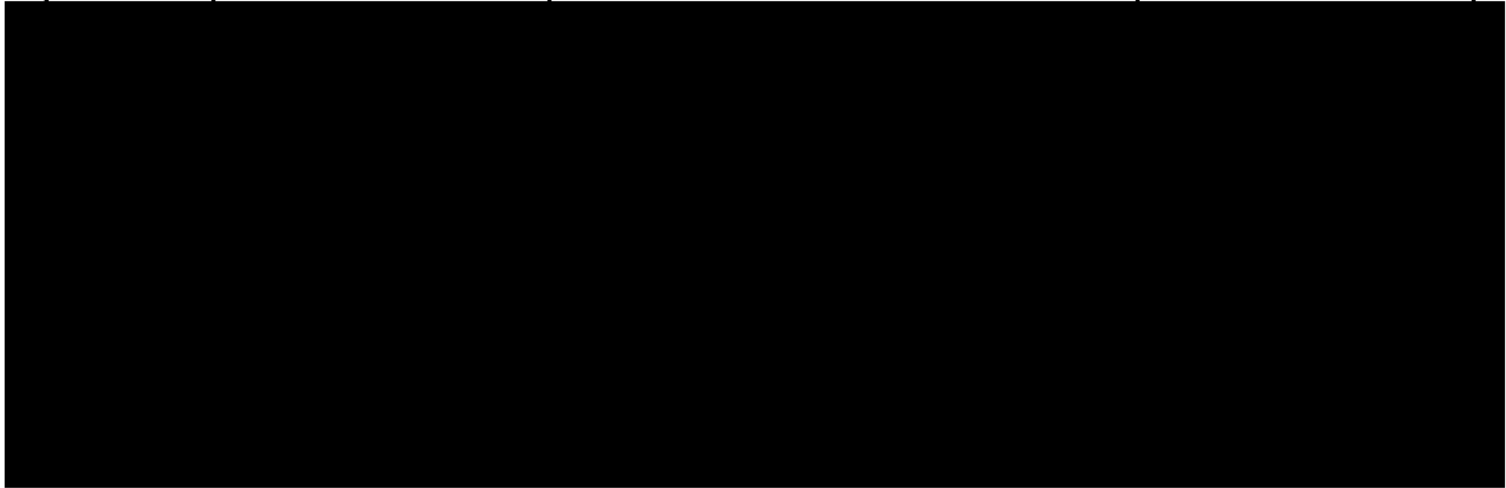
December, 2016

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

<p><i>USDA-RUS</i></p> <p>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p> <p><i>INSTRUCTIONS - See RUS Bulletin 1744-2</i></p>	<p>BORROWER DESIGNATION NM0512</p> <p>PERIOD ENDED December, 2016</p>
<p>Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION</p>	



USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

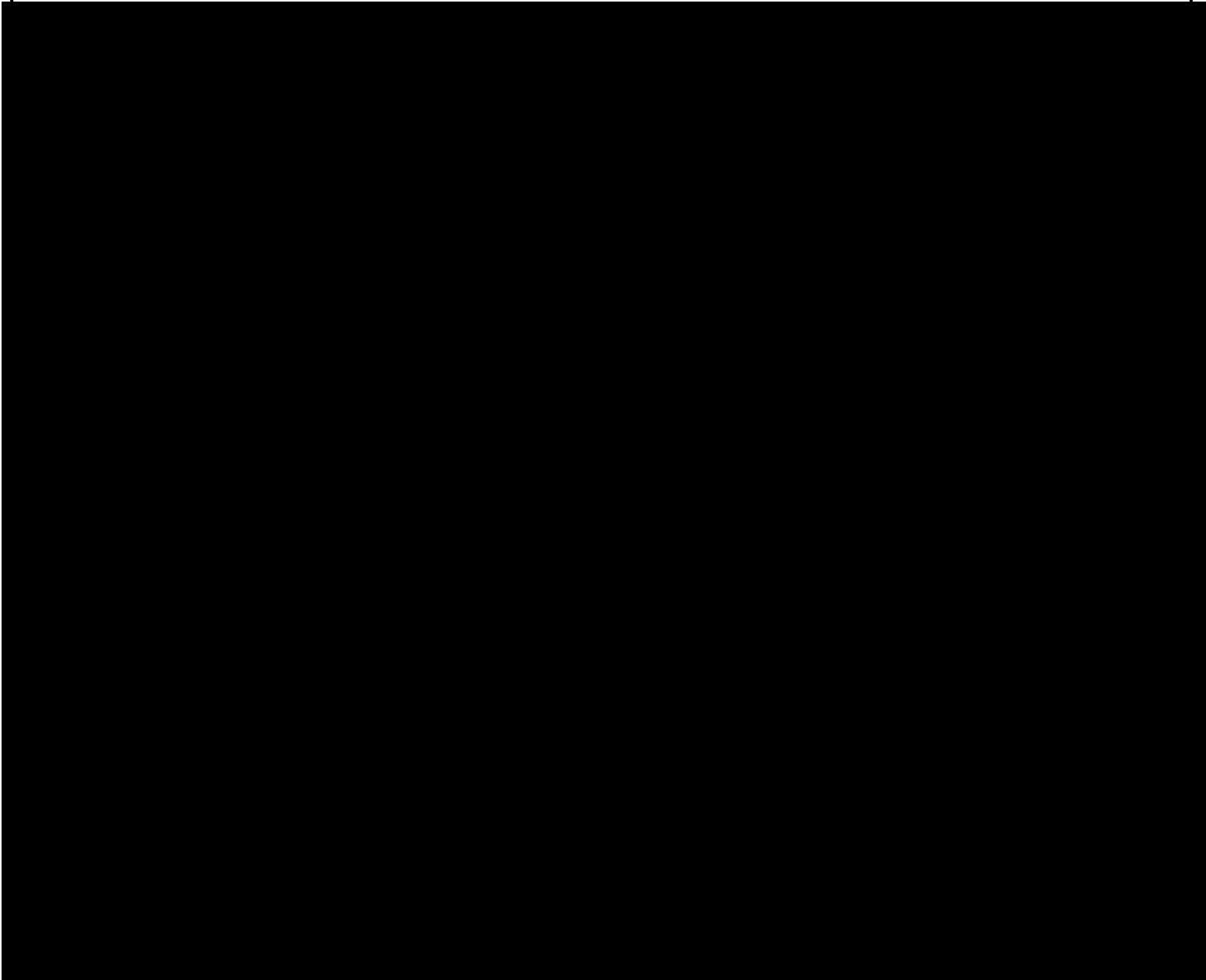
NM0512

PERIOD ENDED

December, 2016

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

<div>USDA-RUS</div> <div>REDACTED - FOR PUBLIC INSPECTION</div> <div>OPERATING REPORT FOR</div> <div>TELECOMMUNICATIONS BORROWERS</div>	<div>BORROWER DESIGNATION</div> <div>NM0512</div>
	<div>PERIOD ENDING</div> <div>December, 2016</div>
	<div>INSTRUCTIONS- See RUS Bulletin 1744-2</div>
<div>PART D. SYSTEM DATA</div>	



<i>USDA-RUS</i> OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	REDACTED - FOR PUBLIC INSPECTION	BORROWER DESIGNATION NM0512
		PERIOD ENDING December, 2016

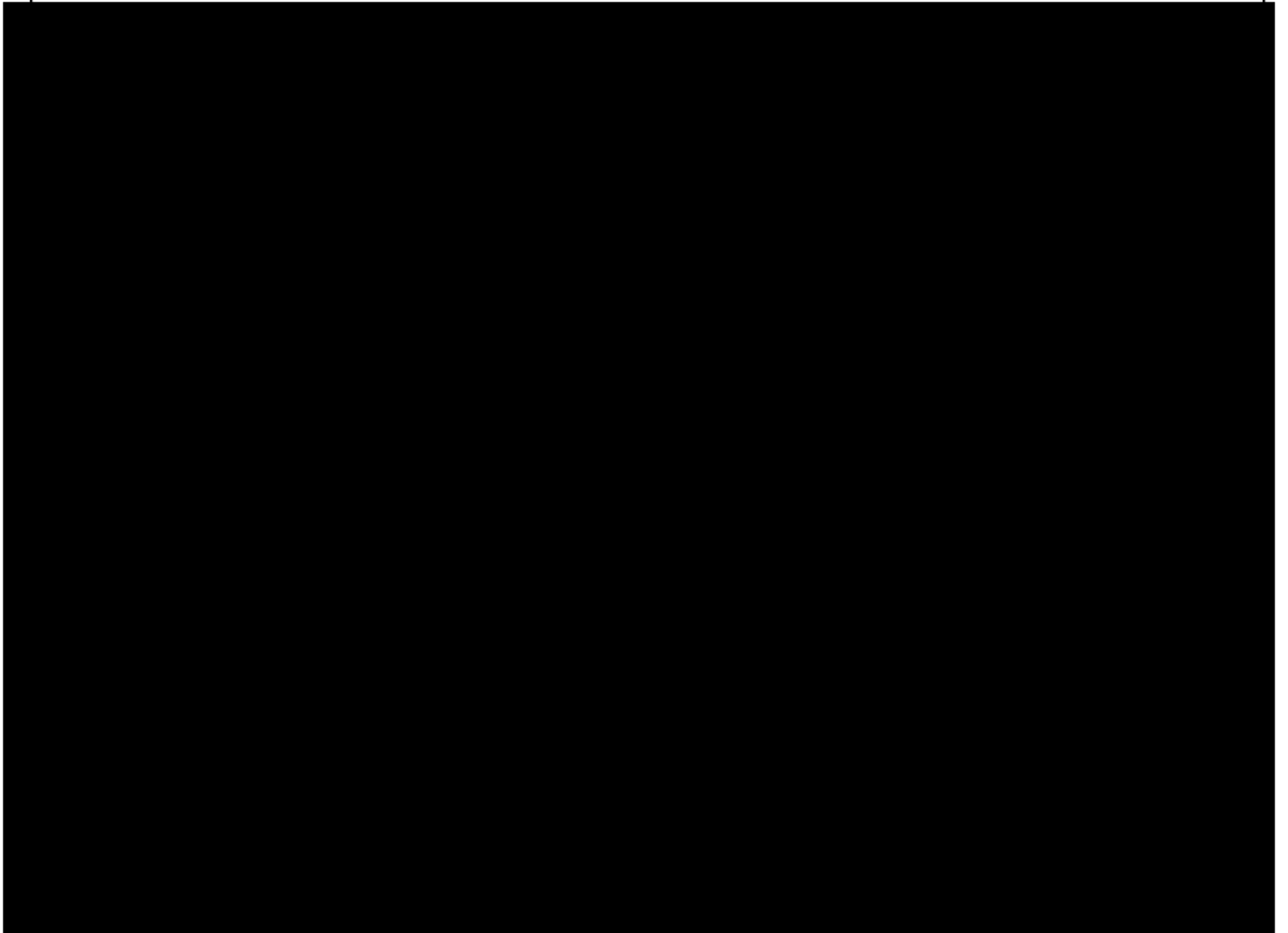
PART H. CURRENT DEPRECIATION RATES

<p align="center"><i>USDA-RUS</i></p> <p align="center">OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p align="center">BORROWER DESIGNATION</p> <p align="center">NM0512</p>
	<p align="center">PERIOD ENDED</p> <p align="center">December, 2016</p>

INSTRUCTIONS – See help in the online application.

This image is a large, solid black rectangle that occupies the majority of the page. It appears to be a redaction of sensitive information or a placeholder for content that is not visible. The black area is uniform in color and extends across most of the width and height of the document.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION NM0512
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	



USDA-RUS	BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	NM0512
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	